# Title I, Part D, Subpart 1 State Agency Neglected and Delinquent Program Handbook



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# What is Title I-D Subpart 1?

#### **Overview**

Title I Part D, Subpart 1, the State Agency Neglected and Delinquent (N&D) program, provides annual grants for supplementary education services for youth in either state-run institutions for juveniles or adult correctional institutions, so these students can have greater educational continuity and opportunity to achieve and make successful transitions to school or employment once they are released.

The Wisconsin Department of Public Instruction (DPI) receives a formula-based allocation from the US Department of Education (ED) each year for Title I-D.

The WI Department of Corrections (DOC) submits a comprehensive application and budget to DPI for a Title I-D Subpart 1 subgrant each year. The DOC assesses needs in its qualifying institutions, collects proposals from those interested in Title I-D funding, and determines the most strategic use of funds. The DOC then works with the institutions to finalize the projected plans and budget for each project and submits the completed application to the DPI.

After the DPI reviews and approves the application, the institutions named in the application carry out the approved activities. As funds are spent, the DOC submits claims to the DPI for reimbursement from the grant award. At the end of the fiscal year, the DOC collects information from Title I-D funded institutions and submits it to DPI. This and other evaluation data is used to improve programming each year.

DPI monitors funded institutions on a regular schedule to ensure the implementation of required activities within the subgrant. Monitoring may include reviews of documents and site visits.

# What Can Title I-D Programming Look Like?

Title I-D, Subpart 1 may support supplemental instruction in core subject areas, such as reading and mathematics, as well as tutoring, counseling, and transition services. The way in which those supplemental services are implemented may look very different based on the institution or the needs of the students. Implementing a successful program with these students and educators may mean that you look at ways you can adapt the materials to be more culturally responsive to the students of your program, add additional time with resources such as technology or teachers, or create co-teaching opportunities to dive deeper with students as they are engaging in their core instruction.

Title I-D has an option for institution-wide projects, which support approved sites (juvenile institutions only) to upgrade education and transition efforts in a more comprehensive way. These projects require a separate application. This does not include additional funding, but it may lead to opportunities for flexibility in the way the institution is using its funds.

#### Coaching Consideration:

- How are you actively seeking data beyond the "easy" numbers to understand the needs and perspectives of those you are trying to lead or serve?
- Will this help empower educators to meet the needs of all students?

# Resources for Learning More About Title I-D and Effective Education in Correctional Facilities

#### Title I-D

- <u>U. S. Department of Education. "Non-Regulatory Policy Guidance for Title I, Part D: Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent or At Risk." Washington, DC, 2006.</u>
- ED's web section on Title I, Part D includes a Resources webpage.

#### **High Quality Education**

- The U.S. Department of Education (ED) provides a guidance package for providing highquality education in secure care settings on its <u>Correctional Education in Juvenile Justice</u> <u>Facilities webpage</u>. It includes:
  - o Guiding principles for providing high-quality education in juvenile justice settings
  - Guidance about responsibilities under the Individuals with Disabilities Education Act
  - o Information on student civil rights
  - o Information on access to Pell Grants for incarcerated students
  - Links to additional resources and technical assistance
- The National Technical Assistance Center for the Education of Neglected or Delinquent Children and Youth (NDTAC) website provides resources across a number of topics crucial for promoting positive outcomes.
- Wisconsin Information on the Education of Students in Jail & Detention Centers
- Wisconsin GED and HSED
- Department of Public Instruction Math and Literacy

#### **Transitions**

- <u>The National Reentry Resource Center (NRRC)</u> provides education, training and technical assistance to states, tribes, territories, local governments, service providers, non-profit organizations and corrections institutions working on reentry.
- National Technical Assistance Center for the Education of Neglected or Delinquent Children and Youth (NDTAC) offers a <u>Transition Toolkit</u>.
- National Center for Youth Opportunity and Justice
- National Center on Education, Disability and Juvenile Justice
- Wisconsin Department of Children and Families Youth Justice

# **Racial Equity**

- Promoting Excellence for All: A Report from the State Superintendent's Task Force on Wisconsin's Achievement Gap
- Family and Community Engagement in Promoting Excellence for All

#### **Organizations/Associations**

- Wisconsin Chapter: National At-Risk Education Network
- Wisconsin Department of Corrections
- Wisconsin Mathematics Council
- Wisconsin State Reading Association
- Wisconsin Title I Association

# **Title I-D Program Essential Components**

Title I-D institutions can be sites of transformational programming and relationships. Title I-D is a funding source, but used strategically, it can help you accomplish larger goals, including supporting educational stability and providing equitable educational opportunities.

#### **Focusing on the Greatest Needs**

There are several aspects of the program that help ensure that services reach students with the greatest needs. Responsibility rests with the DOC and each individual institution participating in Title I-D.

Needs assessment requirements, placement and priority protocols, cycles of program evaluation, and a set of eligibility requirements for both students and institutions work together to help make sure Title I-D services target actual student needs and reach the students with the greatest needs.

#### **State Agency Level Needs Assessment**

The DOC is responsible for assessing student and program needs across eligible institutions to ensure Title I-D funding goes where it is needed most. There is no required process or tool for assessing needs and the state agency should consider processes they may already be implementing or familiar with. The process can include looking at student assessment data, staff and institution capacity, programming evaluations, and more. The state agency should use the needs assessment data to inform the implementation of Title I-D projects at institutions to include in the annual application for Title I-D funding.

#### Institutional Level Needs Assessment

Institutions proposing Title I-D projects are required to articulate how proposed projects meet demonstrated needs. Institutions receiving funding are required to report year-end data, including participant demographic and outcome data, which can be helpful in program evaluation and assessing overall needs.

#### Coaching Consideration:

- If you are selecting an innovation or change, is it based on a root cause analysis, and is it the most effective step you can take to address the root cause?
- How is organizational culture (beliefs, identity, values) an honest and visible part of the conversation around selecting strategic actions and improvements?

#### **Placement and Priority Protocols**

To ensure eligible students can access services right away, institutions are required to assess individual student needs, to the extent practicable, immediately upon entry to the correctional institution.

Institutions are also required to provide priority of services to eligible youth who are likely to be released within a two-year period. This necessitates having procedures and protocols in place for prioritization.

#### **Eligible Students**

Students served by Title I-D services must meet eligibility requirements, but an institution does not have to serve all eligible students. Title I services should be based on needs. If a student does not show evidence of needs for supplemental services, there is no requirement to provide Title I services (20 U.S.C. §1415 (a)(2)(B)(i)).

To be eligible for Title I-D services, a student must be in an eligible institution that has a regular program of instruction that meets the requirements for a Title I-D program. In addition, the student must be:

- Eligible for a free public education (students with a high school diploma are not eligible, but students with a GED who are working toward a high school diploma are eligible),
- 21 years of age or younger, and
- Enrolled in the institution's regular program of instruction.

#### **Eligible Institutions**

Eligibility does not mean an institution will automatically receive funds. The DOC decides which institutions to include in its annual Title I-D grant application based on the greatest needs.

An eligible institution is a public or private facility that:

- Operates for the care of youth (age 21 or under) who are neglected or delinquent,
- Provides free public education and a regular program of instruction that meets requirements, and
- Has an average length of stay of at least 30 days (average length of stay is calculated by determining the length of time each youth entering the institution stays and dividing that number by the total number of youths passing through that institution during a given year).

A regular program of instruction consists of classroom instruction (not beyond grade 12) in basic school subjects such as reading, mathematics, and vocationally oriented subjects, and that is supported by non-Federal funds. Neither the manufacture of goods within the institution, nor activities related to institutional maintenance, are considered classroom instruction.

The program must provide a minimum number of instruction hours per week (20 U.S.C. §1411 & 1432):

- An adult institution must provide at least 15 hours per week of instruction.
- A juvenile institution must provide at least 20 hours per week of instruction.

Courses for college credit do not qualify, unless they are dual enrollment courses that also count for high school credit (20 U.S.C. §1415 (b)).

# **Transition Supports**

#### **Required Reservation for Transition Supports**

The DOC must reserve between 15-30% of its total Title I-D allocation for transition services. In the application, the state agency must describe the plans for the funding designated for transition services.

Transition services are "projects that facilitate the transition of youth between institutions and schools served by local educational agencies; or the successful reentry of youth offenders, who are age 20 or younger and have received a regular high school diploma or its recognized equivalent, into postsecondary education or career and technical training programs, through strategies designed to expose the youth to, and prepare the youth for, postsecondary education or career and technical training programs" (20 U.S.C. §1418 (a)).

Strong transition programs emphasize the importance of thinking "exit-upon-entry" and working toward that goal. Transition can include services within the institution, pre-release, and post-release. As an institution, you can consider how transition services may be helpful in supporting your students outside of the educational programming they are already receiving.

#### Coaching Consideration:

- How are Title I-D students supported in their efforts back to secondary school, post-secondary education, employment, or community?
- How are Title I-D students supported as they enter and transfer into the facility with the ultimate goal of a successful transition after they exit the facility?

#### **Transfer of Records**

Prompt transfer of records is required to help support a student's continuity in their education. This includes relevant assessments and appropriate academic records, such as IEP documents related to special education services. The state agency and Title I-D institutions are required to collaborate with districts and alternative education programs that eligible students may attend either before or after incarceration." (20 U.S.C. §1414(c)(13))

## **Students Who Qualify for Special Education Services**

In addition to Title I-D requirements, facilities must meet Individuals with Disabilities Education Act (IDEA) requirements.

To meet the needs of students with Individualized Education Programs (IEPs), institutions must ensure supports to meet existing IEPs and ensure that licensed teachers and staff are trained to work with students with IEPs. (20 U.S.C. §1414(c)(17))

To support successful transitions and continuity of services, institutions are required to notify LEAs of any students with IEPs who intend to return to that LEA." (20 U.S.C. §1414(c)(15))

# **Family Engagement**

Title I-D requires that the state agency (DOC) work with parents and get their help to improve the educational achievement of their youth and prevent further involvement in delinquent activities. (20 U.S.C. § 1414(c)(14)). Family engagement activities may be at the state agency level, at individual institutions, or both. The following are some possible activities:

- Parent involvement activities, such as offerings or resources that integrate parent participation into the educational efforts of the institution
- Opportunities for eligible students to learn or improve parenting skills
- Activities or opportunities in which parent input is received and used to inform practices
- Resources for parents of Title I students to improve their students' achievement and transition success

• The state agency could work to gather parent input to build data and inform the Title I program across their system

The NDTAC website provides resources for family engagement.

## **Required Coordination with Other Programs**

Title I-D programs must coordinate with any programs under the Juvenile Justice and Delinquency Prevention Act of 1974 or other comparable programs, if applicable (20 U.S.C. § 1414(c)(19)). Possible additional programs to coordinate with include the Individuals with Disabilities Education Act subgrants, Carl Perkins Career and Technical Education subgrants, and comparable juvenile justice and delinquency programs.

## **Calendar of Activities and Deadlines**

Month	Level of State Agency Responsible		Activities
	DOC Admin	Institution	
June			DPI receives the preliminary Title I-D allocation amount for WI from US Department of Education (ED). DPI notifies DOC of the amount. Allocation is based on Annual Count data from the prior calendar year.
		X	Institutions examine data to evaluate programming and plan for next year, using data to improve
July	X		DOC requests end-of-year data and funding requests for the next fiscal year from facilities
		Х	Institutions provide end-of-year data and funding requests to DOC administration.
	Х		DOC completes a needs assessment based on data from institutions and decides which funding requests to include in the Title I-D Subpart 1 application
August	Х		DOC submits Title I-D Subpart 1 application via the WISEgrants electronic grant management system  DEADLINE: August 31
	Х		DOC submits outcome and demographic data of students served in the prior year to DPI via the <u>WISEgrants</u> electronic grant management system <b>DEADLINE: August 31</b>
October	Х		DPI sends instruction packet for the Annual Count to DOC. DOC sends Annual Count forms to institutions. The DOC would include any additional details including the date they are choosing as an agency.
December		Х	Qualifying institutions, whether or not they receive (or expect to receive) Title I-D funding in any particular year, must submit Annual Count forms and data to DOC. This data is used by ED to determine the annual Title I-D allocation for the state.
	Х		DOC submits Annual Count forms to DPI  DEADLINE: first business day in January
May-June	Х	X	DPI works with the DOC administration and institution to conduct monitoring visits on a rotating schedule. DPI will monitor on a rotating schedule and each Title I-D-funded institution will be monitored once every three years.

#### Ongoing DOC Admin Activities:

- Obligate funds for approved items
- Implement programming as outlined in grant application
- Make budget adjustments in WISEgrants as necessary
- Submit claims for reimbursement

#### Ongoing Institution/Site Activities:

- Identify and serve eligible students
- Obligate funds for approved items
- Implement programming as outlined in grant application
- Collect data to track student progress and inform program improvement

# **Annual Application**

DOC administration completes the Title I-D application via the <u>WISEgrants</u> electronic grants management system. The application includes narrative questions and related budgets.

The DOC administration coordinates the planning and application process with eligible institutions. Programming at each institution is called a "project" for the purposes of the grant.

Please reference the online application for specific details or the <u>WISEgrants technical assistance</u> webpage.

#### **Planning a Project**

To be effective, projects should respond to student needs at their root causes. Use needs assessment and evaluation data to understand and identify gaps between current outcomes and desired outcomes. Pay attention to any shifts in demographic data that may point out if adjustments in support are necessary. Gathering input from students and staff can give you a richer picture of the stories behind the data hidden in the outcomes and measurements.

With a picture of needs, gaps, and goals, look for the evidence-based approaches that are most likely to shift outcomes in the direction you envision. Make sure there's a reason to what you're proposing, so you can draft a strong service delivery plan to support your application for funds. Be clear about the following:

- Whom are you serving, what their needs are, and how you know
- The desired outcome, in the short term and the longer term, and how you will measure success or impact
- The services or other benefits you will provide, and how they meet the identified needs
- The facility's transition plan for students participating in Title I-D, and how this project supports it
- The facility's overall professional development plan, and how any professional development included in this project supports it
- How you will ensure that necessary processes/procedures and structures are in place to support success and ensure compliance with grant guidelines
- How you will engage families

#### Coaching Consideration:

- What new knowledge and skills are needed in order to implement your program strategy or change? How will capacity be built around these knowledge and skills?
- Who is at the table when you make decisions regarding your TI-D plan? Who has the "loudest voice"? Whose voice is missing in the plan? How could you include missing voices in a way that can improve your TI-D program?

#### Responsibilities for Institutions Included in the Application

Institutions included in the Title I-D application work with the DOC administration to complete these application requirements:

- 1) Assess the needs of the program to shape the proposed project and its budget. The Title I-D program evaluation tool and guide, available on the <u>Subpart 1 Forms and Applications</u> webpage may be used to evaluate the data, needs, root cause, and goals to support this process.
- 2) Answer the following application questions:
  - Proposed Title I Project Description: Describe the proposed Title I project including a description of objectives, relation to the intended goals established by the state, and how Title I staff and services will be used to obtain intended objectives (20 U.S.C. § 1414(c)(3) & (4)).
  - Needs Assessment: Describe the procedures used to assess the educational needs of students to be served. Describe what assessments are used, how the data is analyzed to inform instructional practices, and when the assessments are given within the student's stay (20 U.S.C. § 1414 (c)(1)).
  - **Professional Development:** Describe the intended professional development/training program(s) reflecting the activities of Title I staff for the new project year. Describe the institution's professional development plan, which will include both regular classroom instructional and support personnel and Title I-D funded staff members (20 U.S.C. § 1414 (c)(10)).
  - Transition Plan: Describe the procedures and activities employed to assist the student's transition from the Title I-D program to the next correctional site, school system, or employment situation. Identify individual(s) in your institutions who are responsible for issues relating to the transition of students from the institution (20 U.S.C. § 1414 (c)(11) & 6438).
  - Additional Services: Describe any additional services to be provided to Title I students, such as career counseling, distance learning, and assistance in securing student loans and grants (20 U.S.C. § 1414 (c)(18)).

# **Budgeting and Allowable Costs**

Allowability of a budget item is determined by a number of factors. Items must follow general guidelines for federal funding and support the activities of the Title I-D program described in the approved application. Consider how does this cost improve educational or transitional services for Title I students' success?

A Title I-D purchase must meet the following criteria:

# • It must provide support for transition OR high-quality educational experiences that help students meet challenging state academic standards:

- Does the service or purchase assist students in transitioning back to secondary school, to employment, or to post-secondary school? Transitional services can include activities within the institution as well as pre- and post-release activities.
   OR
- Is the purchase or program intended to provide students the opportunity to meet the same academic standards expected from all Wisconsin students?

#### It must be supported by evidence of effectiveness

- o Is the program or purchase backed by evidence-based research?
- Is the program or service shown to improve educational or transitional outcomes in the identified needs of the students it is intended for?

#### • It must be supplemental to the state/local-funded educational programs

- Are the materials and services intended to supplement and improve the quality of educational services provided for students identified as failing or most at-risk of failing?
- Title I funds cannot be used to fulfill any of the instruction time that is part of the "regular program of instruction" requirement.

#### • It must be reasonable and Necessary

- Is the purchase reasonable and necessary for your Title I program or to meet the needs of your students?
- Would a prudent person make such a purchase?

#### Title I-D expenses might include:

- personnel
- equipment
- materials & supplies
- professional development
- purchased services
- transition related costs
- parent involvement support costs

Costs must meet the following general criteria in order to be allowable under federal awards (2 C.F.R. Part 200, Subpart E, 200.403):

- be necessary and reasonable,
- be allocable,
- conform to 2 C.F.R. Part 200 or the federal award requirements as to types or amount of cost items.
- be consistent with policies and procedures that apply uniformly to both federally financed and other activities,
- be accorded consistent treatment. A cost may not be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the federal award as an indirect cost,
- be determined in accordance with generally accepted accounting principles (GAAP),
- not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program, and
- be adequately documented.

If you have questions about allowability, visit the DPI <u>Uniform Grant Guidance webpage</u>, reach out to your Title I-D consultant for more information and/or assistance, or connect with your administration grant support accountant or application administrator (20 U.S.C. §1415) (2 C.F.R. Part 200, Subpart E, 200.403).

# **Institution-Wide Projects**

Institution-wide Projects allow approved sites to serve all students and upgrade the entire education and transition efforts of juvenile programs served under the DOC. Juvenile programs under the DOC are encouraged to explore and determine if an Institution-Wide Project would be helpful for their site. These projects require a separate application, the <u>Institution-Wide Project Application</u>, Form PI-7507. Details are included in the application. For more assistance, contact your Title I-D consultant.

# Using Data to Improve: Reporting and Program Evaluation

Evaluation at the local level can help inform the development, planning, implementation, and improvement of local Title I-D programs as well as informing DOC planning at the state agency level. While an evaluation of Title I-D programs is required at the state agency level and at each participating institution, there is no particular form or tool that must be used. The DPI has developed an <a href="Evaluation Guide and Tool">Evaluation Guide and Tool</a>, available on the DPI Title I-D website, that both the DOC administration and local institutions may use to evaluate programs. The DOC may use any evaluation process as long as the requirements outlined in the Title I-D Evaluation Guidelines are met.

#### **Annual Reporting on Students Served and Outcomes**

At the end of the fiscal year, the DOC compiles data from Title I-D programs. The DOC submits data to the DPI by the end of August, using <u>form 9576 D-1</u>. The DPI in turn reports data to the U.S. Department of Education (ED) so that agency can compile a national picture of demographics and outcomes to see larger trends (20 U.S.C. §1431 (a)).

The required data includes demographic and outcome data about students served with Title I-D funds. Program Data Collection Guidelines are available on the <u>Subpart 1 Forms and Applications</u> <u>webpage</u>. If you have additional questions, please reach out to your Title I-D consultant.

# **Institution-Level Evaluation Requirements**

Each institution is required to evaluate its Title I-D program to determine the program's impact on student academic achievement and transition to further educational programs, postsecondary education, or employment. The institution is required to use the results of the most recent evaluation to plan and improve the program trends (20 U.S.C. §1431 (a) and §1414(c)(6)).

Data collected for annual end-of-year reporting can be useful in the evaluation process.

Institutions are required to provide a copy of the evaluation during monitoring. It must include the following:

- A disaggregation of student achievement data by gender, race, ethnicity, and age and an analysis of the implications of the data on the program and student success
- A description of how the institution uses data to maintain and improve educational achievement, operate and enhance transitional programs, and facilitate school credit

accrual for the purpose of grade promotion, graduation, or an equivalent graduation program

#### **State Agency Evaluation Requirements**

State agencies are required to evaluate their Title I-D program at least once every three years and use the evaluation results to inform and improve its overall Title I-D program (20 U.S.C. §1431 (a)). The DOC is required to maintain records regarding the evaluations. The DPI requests and reviews evaluation records as part of the monitoring process.

The program evaluation must disaggregate data on participation by gender, race, ethnicity, and age (while protecting individual student privacy) in order to determine the Title I-D program's impact on participants' ability to do the following:

- Maintain and improve educational achievement and to graduate from high school
- Accrue school credits that meet state requirements for grade promotion and high school graduation
- Make the transition to a regular program or other education program operated by a local education agency
- Complete high school (or high school equivalency requirements) and obtain employment after leaving the correctional facility or institution
- As appropriate, participate in postsecondary education and job training programs

#### **Other Fiscal Considerations**

Using federal funds within your program comes with some specific guidelines on how your funds are spent, how the money is tracked, and what is allowable. Below in this section there is some information on the requirements but it is important to check with your business manager at your institution and the agency accountant and program coordinator that helps support the Title I-D program. They will likely have the information from an administrative and local level that helps support how you are implementing these practices.

Visit the <u>Uniform Grant Guidance webpage</u> for more information on allowable costs, written procedures, and other guidelines.

#### Claims and Reimbursement

Submit claims via the <u>WISEgrants web portal</u>. Visit the <u>Claiming or Returning Federal Funds</u> webpage for instructions and other information about submitting claims.

#### Time and Effort

Charges to Title I-D for salaries and wages must be based on records that accurately reflect the work performed (2 C.F.R. §200.430 (i)). These records must:

- be supported by a system of internal controls which provides reasonable assurance that the charges are accurate, allowable, and properly allocated,
- be incorporated into the official records of the sub-recipient,
- reasonably reflect the total activity for which the employee is compensated by the subrecipient,
- encompass both federally assisted and all other activities,
- comply with established accounting policies and practices of the sub-recipient, and
- support the distribution of the employee's salary or wages.

#### **Capital Assets/Equipment**

Procedures for managing equipment (including replacement equipment), whether acquired in whole or in part under a federal award, are required until disposition takes place (2 C.F.R. § 200.313(d)). At a minimum, procedures will meet the following requirements:

- property records must be maintained;
- a physical inventory of the property must be taken and the results reconciled with the property records at least once every two years;
- a control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft must be investigated;
- adequate maintenance procedures must be developed to keep the property in good condition; and
- if the sub-recipient is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.

# **Annual Count Process and Requirements**

The Annual Count is a one-day snapshot of the total number of N&D students in the state (based on set criteria) that helps the US Department of Education (ED) create state-level Title I-D allocations for the next fiscal year. Each eligible institution completes an Annual Count form, and the DOC submits copies of these forms, along with a summary, to DPI. DPI reviews and submits data to ED.

The process is initiated in October each year. DPI sends an Annual Count packet, including instructions and forms, to the DOC. The DOC selects a uniform date for all institutions to use for the count, distributes forms and instructions to institutions, and collects the completed forms. The DOC must submit the compiled data to DPI by the first business day in January.

#### Which Students are Counted?

The criteria for students for the Annual Count is similar but not identical to the criteria used to determine eligibility for Title I-D services. Students should be included in the Annual Count if they are:

- 20 years of age or younger,
- Enrolled at an eligible Title I site with an average length of stay of 30 days or more, and
- Enrolled in a "regular program of instruction" that provides the required number of hours per week of instruction (at least 15 hours for adult institutions, at least 20 hours for juvenile institutions) using non-federal funds (Title I-funded instruction does not count toward the minimum hours).

Since the age requirements are different for the Annual Count and student eligibility for services, and since not every eligible student may show a need for services, the number of students in the Annual Count may not be the same as the number of students served. To ensure the state gets an accurate funding allocation for the next fiscal year, it is essential for institutions to count all students eligible to be included in the Annual Count, whether or not they receive services.

The DOC must keep the records to verify its Annual Count submission for five years after the count is submitted (20 U.S.C. §1412 (a)(1)(A)).

# **Monitoring**

Under the Every Student Succeeds Act, DPI is required to monitor institutions receiving Title I-D Subpart (20 § U.S.C. 6434 (a)(2)(D)). Institutions selected for monitoring are required to submit specific materials to demonstrate compliance with grant requirements, and DPI staff review materials and make site visits to ensure that federally funded programs are operating in accordance with the approved application and supplementing the regular program of education.

To ensure your program follows all requirements, refer to the monitoring guidance documents, as well as this handbook, as you implement your program. Monitoring guides for the DOC and for institutions is available on the DPI Subpart 1 Forms and Applications webpage.

The DPI consultant will reach out if your institution or the DOC is selected for monitoring. The consultant will work with you to arrange a timeline for submitting any required paperwork and to schedule a site visit to discuss your Title I-D program implementation.

At the end of the monitoring visit, DPI staff provide a preview of the main points to be included in the final report. DPI staff send the written report to the institution and DOC grant administrator within six weeks. The formal report includes recommendations, any needed corrective action, along with an offer of technical assistance as appropriate.

If there are corrective actions that need to be taken or other adjustments that need to be made, DPI will work with the DOC and the institution to resolve the issues within a prescribed time frame (usually within 30 days).

#### **Tips to Consider**

- Documenting your processes as you implement the requirements mentioned throughout this handbook can help maintain your programs implementation and support continuity in case of staff turnover.
- If you are an institution being monitored or hoping to ensure you are in compliance with the requirements, reach out to DOC administration for support.
- If monitoring is new to you, connect with sites that been through the monitoring process to hear about their experiences.